

## REMARKS

The specification has been amended to correct the error noted by the Examiner and also to update the related application information.

### Art rejections

The art rejections are respectfully traversed.

Since the references are many and/or complex, Applicants will confine their remarks to those portions of the references cited by the Examiner, except as otherwise indicated. Applicants make no representation as to the contents of other portions of the references.

Any of the Examiner's rejections and/or points of argument that are not addressed below would appear to be moot in view of the following. Nevertheless, Applicants reserve the right to respond to those rejections and arguments and to advance additional arguments at a later date. No arguments are waived and none of the Examiner's statements are conceded.

### Claim 1

Claim 1 recites an RF transceiver coupled to a POD module interface.

Against this recitation, the Examiner cites Margulis. In Margulis, so far as Applicants can tell, the wireless aspect is in a different portion of the system. The wireless aspect is to allow the TV to be moved around the house. It looks like the cable decoder is still hardwired into the wall. Applicants do not see where Margulis deals with a POD module at all.

The primary reference, Bessel, does have a POD, but it appears to be hardwired. Accordingly, the references seem to be similarly deficient.

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The Examiner said that it would be obvious to combine these references to achieve multiple locations. However, inserting and removing a POD does not relate to achieving multiple locations. Instead, as explained in the specification, what is achievable is multiple functionalities for the TV. It is not clear what the Examiner thinks the invention has to do with multiple locations. Therefore, the alleged motivation to combine the references does not appear to relate to the invention at all.

Applicants accordingly respectfully submit that the Examiner has failed to make a *prima facie* case against claim 1.

Claim 13 is a bit broader than claim 1 in not reciting the reverse direction of communication, from the communication device back to the set top box. However, the above arguments would nevertheless appear to be applicable.

New claims 24 & 26 emphasize that changing the removable circuit changes the functionality of the television. Applicants respectfully submit that this is not taught or suggested by the reference; and that this claim therefore distinguishes even more clearly over them.

New claims 25 and 27 emphasize that the circuit is adapted to act as a security device.

The new method claim 22 also more clearly relates to changing the functionality of the television by replacing the POD module.

### Claim 2

Claim 2 recites that the incoming baseband and RF signals — processed by the POD — relate to an Internet Protocol.

Against this recitation, the Examiner cites Margulis, which apparently shows receiving data from various sources at the same time. The Examiner rationalizes this combination on the

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grounds that the user might want to check an EPG at the same time as watching a television program.

However, the claim recites that the POD is removable. What does that have to do with watching television at the same time as using the Internet? Applicants respectfully submit that this is an impermissible hindsight reconstruction.

**Hendricks**

The Examiner applies this reference against several claims, asserting that it is a reference relevant to POD technology. Applicants respectfully disagree that this reference applies to POD technology. Hendricks seems to be a set top box with user terminal capability, not a POD. As explained in the specification at pages 11-12, the term "POD" in the art is not just any set top box. A POD is used with a standard set top box, generally for security purposes with respect to a particular service. Applicants accordingly respectfully submit that one of ordinary skill in the art would not apply Hendricks as the Examiner has done.

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Applicants respectfully submit that they have addressed each issue raised by the Examiner - except for any that were skipped as moot - and that the application is accordingly in condition for allowance. Allowance is therefore respectfully requested.

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Respectfully submitted,

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